

**BSC Owner LLC  
1390 Pennsylvania Ave, 2<sup>nd</sup> Floor  
Brooklyn, NY 11239**

**Subject: Starrett City Power Plant Permit Modification [Mod 2] Application  
2-6105-00263/00008- AIR TITLE V MODIFICATION 2  
New Diesel Generators – Air Permit to Construct / Operate  
Response to “Receipt of Comments” from EPA - 11/7/2019**

Suilin Chan  
Chief, Air Permitting Section  
Region 2, EPA

Prior to and upon taking ownership of Spring Creek Towers a.k.a. Starrett City (a large-scale affordable housing development home to approximately 18,000 residents) BSC Owner LLC committed to making capital investment improvements to the overall infrastructure of the facility. One area that has been a key focus of this effort has been the facility's power plant.

Spring Creek Towers relies on an independent power plant for all on-site electric and thermal loads. The Power Plant, constructed at the time that Starrett City was developed, is roughly 50 years old and has no connection to the local electrical utility grid.

The Power Plant was designed to supply an electrical load of 18 megawatts (MW). Over time, the equipment has been de-rated to about 13.5 MW, due to emissions restrictions and limitations of mechanical components. Of this, 3.2 MW is generated by three dual-fuel Nordberg reciprocating engines. These units have proven to be unreliable in the past few years, with failures to two units within the last year, one of which required a total rebuild to return to service. Therefore, the Power Plant can only provide 10.3 MW of power dependably – less than Starrett City's peak load of 11.2 MW. To confront this issue, BSC Owner commissioned the design, procurement, and installation of two 4MW Tier 4 compliant CAT diesel generators, along with a new 5kV electrical switchgear assembly and system automation technology. In the past 5 years, Spring Creek Tower's residents have faced multiple black outs due to failures at the Power Plant and it is the intent of this new system to provide additional capacity to alleviate these issues. This need is further amplified in the midst of COVID-19 as more people are staying home and load is expected to increase beyond historical levels.

BSC Owner has made commitments to the community, the tenants association and to NYS Homes & Community Renewal (HCR) to have these new units in service for the 2020 summer peak season. As of today, BSC Owner remains on track to meet that commitment. The units have been installed on site and all system connections have been made to facilitate operation of the new engines. BSC Owner is scheduled to begin commissioning and shake down runs of these units starting the week of June 8<sup>th</sup>. However, BSC Owner is unable to proceed without your approval. Any delays to the commissioning process at this late date will cause a delay in placing this new

equipment into service. BSC Owner requests that approvals be granted to proceed with this shakedown work within the terms of the Title V permit modification that was provided to BSC by the NYS DEC on 4/15/2020.

BSC Owner began the approval process over a year ago on 4/4/2019 and has been responsive to agency requests and inquiries, summarized as follows:

4/4/2019: BSC Owner submits original application

4/22/2019: NYSDEC request for Short EAF form

4/24/2019: BSC Owner submits Short EAF

8/15/2019: NYSDEC draft permit working copy provided

9/25/2019: NYSDEC final Notice of Complete Application [NOCA

10/19/2019: BSC Owner provides proof of advertisement, conforming with NYSDEC publication request from 9/25/2019

11/12/2019: NYSDEC transmits EPA's inquiry letter dated 11/7/2019

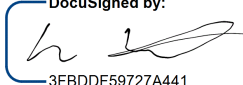
4/15/2020: NYSDEC provides revised draft permit modification

5/5/2020: NYSDEC advises that central office is reviewing NYSDEC Region 2 response to EPA's questions.

5/15/2020: NYSDEC Chief of Air Permitting Thomas John advises BSC Owner to deal directly with EPA Region 2, provides EPA contacts

5/15/2020: BSC Owner/Terranext resend responses previously provided to NYSDEC regarding EPA questions from 2/17/2020

5/20 - 28/2020: BSC Owner/Terranext follow up with EPA regarding status of permit review and issuance.

DocuSigned by:  
  
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**Andrew MacArthur**  
Authorized Signatory  
BSC Owner LLC

CC: Viorica Petriman, EPA  
Sam Lieblich, RAPCE Region 2 NYSDEC  
Thomas John, Chief Air Division Region 2 NYSDEC